

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

OCCIDENTAL CHEMICAL CORPORATION,	)	Hon. Madeline Cox Arleo
	)	Hon. Magistrate Leda D. Wettre
	)	
Plaintiff,	)	Civil Action No. 2:18-CV-11273
	)	(MCA-LDW)
	)	
v.	)	<b>NOTICE OF MOTION FOR A</b>
	)	<b>STAY OF PROCEEDINGS AND</b>
	)	<b>FOR LEAVE TO FILE SAME</b>
	)	
21ST CENTURY FOX AMERICA, INC., <i>et al.</i> ,	)	
	)	
Defendants and	)	
Third Party Plaintiffs,	)	
	)	Return Date: February 7, 2022
v.	)	Oral Argument Requested
	)	
PASSAIC VALLEY SEWERAGE COMMISSIONERS, <i>et al.</i> ,	)	
	)	
	)	
<u>Third-Party Defendants.</u>	)	

PLEASE TAKE NOTICE that on February 7, 2022 Defendants in the Small Parties Group, the Gordon Rees Group, and the CSG Group, along with all Third-Party Defendants (individually and collectively, “Moving Parties”)<sup>1</sup> will move before the Honorable Madeline Cox Arleo for (a) an Order granting leave to file a motion for an order approving a stay of the above-captioned proceedings and (b) an Order approving a stay of the above-captioned proceedings.

In support of this motion, the Moving Parties rely on the attached briefs.

A proposed form of Order is submitted for the Court’s consideration.

---

<sup>1</sup> Defendant SPG members Nokia of America Corporation, Pharmacia LLC, and Public Service Electric and Gas Company have no objection to the relief sought in the Motion for a Stay of Proceedings and accompanying proposed form of Order filed this date, but do not join the brief.

Dated: January 14, 2022

Respectfully submitted,

/s/ Jeffrey D. Talbert  
**PRETI, FLAHERTY, BELIVEAU &  
PACHIOS, LLP**  
One City Center  
Portland, ME 04101  
Tel: 207.791.3239  
Jeffrey D. Talbert, Esq.

*Liaison Counsel for the Small Parties Group*

/s/ Lee Henig-Elona  
**GORDON REES SCULLY  
MANSHUKHANI, LLP**  
18 Columbia Turnpike, Suite 220  
Florham Park, NJ 07932  
Tel: 973.549.2520  
Lee Henig-Elona, Esq.

*Liaison Counsel for the Gordon Rees Group*

/s/ Diana L. Buongiorno  
**CHIESA SHAHINIAN & GIAN TOMASI  
PC**  
One Boland Drive  
West Orange, NJ 07052  
Tel: 973.325.1500  
Diana L. Buongiorno, Esq.

*Liaison Counsel for the CSG Group*

/s/ Grant P. Gilezan  
**DYKEMA GOSSETT PLLC**  
400 Renaissance Center  
Detroit, MI 48243  
Tel: 313.568.6800  
Grant P. Gilezan, Esq.

*Liaison Counsel for Third-Party Defendants  
in the PVSC Group*

/s/ Peter J. King  
**KING MOENCH HIRNIAK & METHA,  
LLP**  
51 Gibraltar Drive, Suite 2F  
Morris Plains, NJ 07950  
Tel. 973.998.6860  
Peter J King, Esq.

*Liaison Counsel for Third-Party Defendants  
in the King Group*

**CERTIFICATE OF SERVICE**

I, Jeffrey D. Talbert, hereby certify that on January 14, 2022, I caused a copy of the foregoing to be served via electronic filing on all counsel of record.

Dated: January 14, 2022

/s/ Jeffrey D. Talbert

**PRETI, FLAHERTY, BELIVEAU &  
PACHIOS, LLP**

One City Center, PO Box 9546

Portland, ME 04112

Telephone: 207.791.3239

Jeffrey D. Talbert, Esq. (Bar # 333512021)